

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA	§	
	§	
VS.	§	3:17-CR-00202-M-1
	§	
ALEXANDER ROSENBLATT	§	

DEFENDANT’S DESIGNATION OF EXPERT WITNESS

Alexander Rosenblatt (Defendant), by and through his attorney of record, Assistant Federal Public Defender Cody L. Cofer, files this designation of expert witness pursuant to the Court’s September 15, 2017, *Third Order Continuing Trial and Pretrial Deadlines* and Federal Rule of Criminal Procedure 16(b)(1)(C).

Robert D. Young
Ability Systems Corporation
PO Box 6593
Aloha, OR 97007

Robert D. Young is president of Ability Systems, an Oregon Corporation specializing in the forensic analysis of computers and computer based evidence. He has performed forensic software analysis and analysis of computer storage media and communications networks since 1988. Mr. Young has testified as an expert on computer forensic matters in federal and state cases.

Mr. Young was retained by the Federal Public Defender’s Office to examine available data storage devices and relevant discovery, and determine the possible

impact the FBI's NIT had on Defendant's computer. Mr. Young will provide insight as to whether the FBI's conduct exposed the subject devices to additional intrusions or hacking by compromising security settings. Further, Mr. Young can testify about the accuracy and reliability of the data relied upon by the Government.

Mr. Young will also provide opinions about the reliability of the FBI's opinions related to:

the places within Defendant's computer where child pornography was allegedly located;

the metadata thought to be associated with alleged child pornography files alleged to have been found on Defendant's computer; and

the artifacts alleged to have been found within Defendant's computer that the FBI suggests would be indicative of child pornography possession, including the existence of folder names on the computer, internet and browser history, and file names.

Mr. Young may clarify terms commonly used by the Government's witnesses, including "metadata," "create dates," "access dates," "allocated space," "unallocated space," "file path," and "volume shadow copies."

He is also expected to testify about reliability of opinions related to the origin, access, and storage of videos and images allegedly found on Defendant's computer.

Respectfully submitted,

JASON D. HAWKINS
FEDERAL PUBLIC DEFENDER FOR THE
NORTHERN DISTRICT OF TEXAS

/s/Cody L. Cofer

Cody L. Cofer

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CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2018, I filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Texas. Assistant U.S. Attorney Jamie Lynn Hoxie was electronically served with a copy of this pleading.

/s/Cody L. Cofer

Cody L. Cofer